

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

23-cv-09648-JGLC-GWC

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JASON GOODMAN,

Plaintiff,

-against-

THE CITY OF NEW YORK and NEW YORK CITY  
POLICE DEPARTMENT, NEW YORK CITY POLICE  
DEPARTMENT LIEUTENANT GEORGE EBRAHIM,  
NEW YORK CITY POLICE DEPARTMENT OFFICER  
CHANDLER CASTRO, NEW YORK CITY POLICE  
DEPARTMENT OFFICER JENNIFER CARUSO, NEW  
YORK CITY POLICE DEPARTMENT OFFICER  
KELVIN GARCIA, JOHN DOE 1, JOHN DOE 2, JOHN  
DOE 3, JOHN DOE 4, JANE DOE, (fictitious names  
intended to be officers, representatives, agents, servants of  
the New York City Police Department, individually and in  
their official capacities, ELON MUSK, X CORP, ADAM  
SHARP.

Defendants.  
-----X

**MEMORANDUM IN  
SUPPORT OF  
MOTION TO STRIKE  
FALSE  
INFORMATION**

Plaintiff, Jason Goodman, (“Goodman”) by and for himself pro se, respectfully requests the Court strike defendant the City of New York’s request for an extension of time pursuant to FRCP rule 12(f) because it contains false and scurrilous allegations which are intended to depict the plaintiff in a negative light and have an inappropriate impact on the ruling on the motion;

**INTRODUCTION**

1. On March 7, 2024, Defendant the City of New York via counsel filed a fourth request for an extension of time to respond to the complaint, (Dkt. 65).
2. Prior to filing, counsel for defendants contacted Goodman by telephone to inform him that she intended to seek a fourth extension of time to respond to the complaint.
3. Plaintiff informed counsel for defendants that he had run out of patience for the repeated delays and was unhappy with what appeared to be deliberate attempts to stall.

4. A warning was issued that a motion for default would be sought against the NYPD officers if they did not appear and that plaintiff did not consent to another extension.

5. At no time during the call did Goodman state that he was “very angry”.

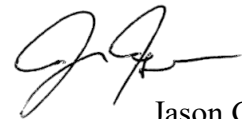
6. Counsel’s choice to falsely attribute a quote to the plaintiff while pleading for a time wasting fourth extension constitutes a false statement made to the Court intended to affect the outcome of the ruling on this motion and should be stricken from the record.

### **RELIEF SOUGHT**

7. Defendants should be compelled to provide evidence that Goodman said he was “very angry” or else be compelled to strike the filing and submit an answer.

Dated: New York, New York March 7, 2024

Respectfully submitted,



Jason Goodman  
Pro Se Plaintiff  
truth@crowdsourcethetruth.org  
252 7th Avenue Apt 6s  
New York, NY 10001  
347-380-6998